

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT CHATTANOOGA**

PARAGON COMPONENT SYSTEMS, LLC  
Plaintiff

v.

QUALTIM INC., CENTER FOR  
BUILDING INNOVATION LLC  
DRJ ENGINEERING LLC, INSPIRED  
PURSUITS LLC, KIRK GRUNDAHL,  
SUZANNE GRUNDAHL

Defendants

Case No.: 1:24-cv-00246-CEA-CHS

**DEFENDANTS' MOTION TO STAY DISCOVERY**

Defendants, by their undersigned counsel, move the court, pursuant to Fed. R. Civ. 26(c), to enter an order staying the proceedings related to the interrogatories served by the Plaintiff on December 3, 2024, and all further discovery proceedings, pending a determination by the court of the legal issues raised by motions filed by all Parties which a hearing date has not been set.

In support of this motion, Defendants respectfully represent as follows:

- 1) On October 1, 2024 a motion to dismiss was filed by Defendants with respect to legal issues on personal jurisdiction, improper venue, and failure to join necessary parties. *See Doc. 21.*
- 2) On October 11, 2024 a motion to file certain Exhibits under seal supporting their motion to dismiss was filed by Defendants.
- 3) Between October 2, 2024 to October 23, 2024 all Parties remained in communication regarding disputed issues.
- 4) On October 24, 2024, Plaintiff filed a motion for limited initial jurisdictional discovery and to stay the deadline to respond to Defendants' motion to dismiss. *See Doc. 36.*

- 5) On November 13, 2024, a motion hearing was held that allowed Defendants to amend their motion to dismiss based on the denial of the motion to seal. *See* Doc. 45.
- 6) On November 26, 2024, the amended motion to dismiss was filed on behalf of Defendants. *See* Doc. 49.
- 7) On December 3, 2024, Plaintiff served the Defendants with a first set of interrogatories, requests for admission, and requests for production of documents. Copies of the first set of discovery requests are attached as Exhibits A-C. The discovery requests do not concern jurisdictional issues, but instead concern substantive issues related to the claims in Plaintiff's original Complaint
- 8) On December 10, 2024, Plaintiff filed a motion for leave to file a supplemental or amended Complaint with a new claim for tortious interference with business relations. *See* Doc. 52. The Court has not entered an order on the motion.
- 9) On December 13, 2024, Plaintiff served the Defendants with a second set of interrogatories, requests for admission, and requests for production of documents. Copies of the second set of discovery requests are attached as Exhibits D-F. The second set of discovery requests entirely relate to the tortious interference claim, which is not presently at issue in the lawsuit.
- 10) Defendants object to both sets of interrogatories, request for admission, and request for production of documents because of the questions of law pending on the motions filed by all Parties.

It is within the trial court's power to stay discovery until preliminary questions that may disposed of the case are determined. *Hahn v. Star Bank*, 190 F.3d 708, 719 (6th Cir. 1999). At this time, all Parties have in their possession all necessary information and documents to support their positions concerning the pending motion to dismiss and the pending motion to amend/supplement the Complaint. Therefore, Defendants respectfully request the Court to stay discovery in the present proceeding in order to conserve the potentially unnecessary significant time and expense that will be necessitated to respond to the proffered discovery requests.

By: s/Mayville La Rosa

Mayville La Rosa (*pro hac vice*)

Law Office of Mayville La Rosa, Esq.

718 Sugar Maple Lane

Verona, WI 53593

Telephone: (608) 800-7353

[mlarosa@kfinnovations.com](mailto:mlarosa@kfinnovations.com)

Michael J. Bradford, BPR No. 22689

LUEDEKA NEELY, P.C.

900 South Gay Street, Suite 1504

P. O. Box 1871

Knoxville, TN 37901-1871

Phone: 865-546-4305

[mbradford@luedeka.com](mailto:mbradford@luedeka.com)

Attorneys for Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of January, 2025, a copy of the foregoing Motion to Stay Discovery was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

s/Michael J. Bradford

Michael J. Bradford, BPR #22,689